

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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MARIA MIRANDA,

Plaintiff,

v.

(PROPOSED) CASE MANAGEMENT  
PLAN

CIVIL ACTION NO. 21 CV 714 (DLC)

Defendants.

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The parties in the above-captioned action, having conferred through counsel, hereby propose the following discovery plan:

Initial disclosures to be served by October 30, 2021.

Initial discovery requests to be served by October 30, 2021.

Fact discovery to be completed by May 16, 2021.

Expert reports, if any, due July 8, 2022.

Rebuttal expert reports, if any, due August 9, 2022.

Expert depositions, if any, completed by September 23, 2022.

Dispositive motions due by July 1, 2022.

Dated: New York, New York  
October 4, 2021

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By: \_\_\_\_\_ /S/  
Denise A. Schulman

By: \_\_\_\_\_ /S/  
Rebecca G. Quinn  
Assistant Corporation Counsel

**SO ORDERED:**

Dated: October \_\_, 2021

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DENISE L. COTE  
United States District Judge